IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JEZIGN LICENSING, LLC 4400 East-West Highway, Suite 811 Bethesda, Maryland 20814-4508, Plaintiff, v. SKECHERS U.S.A., INC. 228 Manhattan Beach Blvd. Manhattan Beach, California 90266-5347 Serve on: CSC-Lawyers Incorporating Service Company 7 St. Paul Street, Suite 820 Baltimore, Maryland 21202, Defendant.	))))))))))))))))))))	Case No. ________________ **JURY TRIAL DEMANDED**

COMPLAINT

Jezign Licensing, LLC ("Jezign") brings this patent-infringement action against Skechers U.S.A., Inc. ("Skechers").

Parties

1. Jezign is a New York limited liability company, having its principal place of business in Bethesda, Maryland.

2. Skechers is a Delaware corporation, having its principal place of business in Manhattan Beach, California.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101, *et seq*.

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Skechers. Skechers conducts continuous and systematic business in this District, and this patent-infringement case arises in part directly from Skechers's continuous and systematic activity in this District. This Court's exercise of jurisdiction over Skechers would be consistent with the Maryland long-arm statute and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1)-(2) and 1400(b).

Count 1 – Infringement of U.S. Design Patent No. D554,848

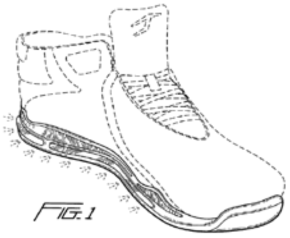
7. Jezign owns the exclusive rights in the ornamental designs claimed in United States Design Patent No. D554,848 (the "'848 Patent") (attached hereto as Exhibit A).

8. Without Jezign's authorization, Skechers made, used, offered for sale, sold, and/or imported into the United States shoes having designs that infringe the '848 Patent (hereinafter the "Infringing Shoes"). The Infringing Shoes include at least the model named "Sporty Shorty Revv Air Flintz" and shoes bearing the same or substantially similar infringing designs, regardless of model name.

9. The overall appearance and placement of the Infringing Shoes' illumination system within the sole is substantially the same as the design claimed in the '848 Patent.

10. An ordinary observer will perceive the substantial similarity between the design of Jezign's '848 Patent and the corresponding design of Skechers' Infringing Shoes.

11. The table below illustrates Skechers' infringement by comparing a figure from the '848 Patent with an exemplary image of Skechers' Infringing Shoes.

‘848 Patent Figures	Exemplary Infringing Shoes:
 FIG. 1	Skechers Sporty Shorty Revv Air Flintz

12. Jezign has been and will continue to be irreparably harmed by Skechers’ infringement of the ‘848 patent.

Prayer for Relief

WHEREFORE, Jezign prays for the following relief against Skechers:

a. Judgment that Skechers has infringed the ornamental designs claimed in the ‘848 Patent;

b. The total profit made by Skechers from its infringement of the ‘848 Patent pursuant to 35 U.S.C. § 289;

c. Injunctive relief;

d. Pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and

e. Such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Jezign demands a trial by jury on all matters and issues triable by jury.

Date: April 21, 2016

Respectfully submitted,

/s/

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